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6 Attorneys for Defendants
7 Dreamdealers USA, LLC d/b/a Exotics Racing,
8 David Perisset, and Roman Thievin

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 EDWARD B. DOUGLAS, an individual,
12
13 Plaintiffs,

14 vs.

15 DREAMDEALERS USA, LLC d/b/a
EXOTICS RACING, A Nevada limited
16 liability company, DAVID PERISSET, an
individual, and ROMAN THIEVIN, an
17 individual,

18 Defendant.

Case No. 2:17-cv-02134-APG-BNW

**PROPOSED STIPULATION AND ORDER
TO EXTEND JOINT PRETRIAL ORDER
DEADLINE**

(SECOND REQUEST)

19 Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and 26-4, Defendants, DREAMDEALERS
20 USA, LLC d/b/a EXOTICS RACING, DAVID PERISSET, and ROMAN THIEVIN, and Plaintiff,
21 EDWARD B. DOUGLAS, by and through their respective attorneys of record, hereby stipulate for
22 an extension of time to file the Joint Pretrial Order of November 25, 2019 to January 24, 2020. This
23 is the second request for an extension to file the Joint Pretrial Order. The requested extension is
24 sought in good faith and not for purposes of undue delay.

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1 Good cause and excusable neglect exist because, in preparation for the Joint Pretrial Order, the
2 parties have engaged in meet and confer efforts and supplemental discovery responses have been
3 made, including Plaintiff's Second Supplemental Responses to Defendant's Interrogatories,
4 Plaintiff's Third Supplemental Responses to Defendant's Requests for Production of Documents,
5 and Plaintiff's Fourth Supplemental Responses to Defendant's Requests for Production of
6 Documents, all of which are relevant to the joint pretrial order. Moreover, the parties have agreed to
7 engage in further settlement negotiations, including the possibility of a formal mediation, and wish
8 to avoid the additional expense of preparing the Joint Pretrial Order in order to conserve resources
9 for potential settlement.
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11
12 Dated: November 20, 2019

Dated: November 20, 2019

13 Respectfully submitted,

Respectfully submitted,

14
15 /s/ Dustin L. Clark, Esq.

/s/ Marcus B. Smith, Esq.

16 DUSTIN L. CLARK, ESQ.
17 HOLLEY DRIGGS WALCH
FINE PUZEY STEIN & THOMPSON

WENDY M. KRINCEK, ESQ.
MARCUS B. SMITH, ESQ.
LITTLER MENDELSON, P.C.

18 Attorney for Plaintiff

Attorneys for Defendants

19
20 **ORDER**

21 **IT IS SO ORDERED.**

22 Dated: November 21, 2019.

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26 UNITED STATES MAGISTRATE JUDGE

27 4819-3639-7736.1 087825.1002